

UNITED STATES DISTRICT COURT

for the

Northern District of New York

UNITED STATES OF AMERICA)

v.)

BRUCE W. WILLIAMS,)

Defendant)

Case No. 1:17-MJ-358 (CFH)



CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of June 26, 2017 through August 4, 2017 in the county of Rensselaer in the Northern District of New York the defendant(s) violated:

Code Section

18 U.S.C. § 2252A(a)(2)(A)

Offense Description

Receipt and Distribution of Child Pornography

This criminal complaint is based on these facts:
See Attached Affidavit

☒ Continued on the attached sheet.

Attested to by the Applicant in Accordance with
the Requirements of Rule 4.1 of the Federal
Rules of Criminal Procedure.

A handwritten signature in blue ink, appearing to read "Chris Smith".

Complainant's signature

Christopher Smith, TFO, FBI

Printed name and title

Sworn to before me and signed in my presence.

Date: 8/18/17

A handwritten signature in blue ink, appearing to read "Christian F. Hummel".

Judge's signature

City and State: Albany, NY

Hon. Christian F. Hummel, U.S. Magistrate Judge

Printed name and title

AFFIDAVIT

I, Christopher Smith, having been first duly sworn, do hereby depose and state as follows:

1. I am an Investigator with the Colonie Police Department and a Task Force Officer with the Federal Bureau of Investigation (FBI). I have been so employed by the Colonie Police Department since June 2004 and the FBI since June 2012. I am currently assigned to the Albany Division, Albany, New York. My duties include investigating criminal violations relating to child exploitation and child pornography, including violations pertaining to the illegal production, distribution, receipt and possession of child pornography in violation of 18 U.S.C. §§ 2252 and 2252(A). I have received extensive training in the area of child sexual exploitation, and have observed and reviewed numerous examples of child pornography in all forms of media including computer media.

2. I am an investigative or law enforcement officer of the United States within the meaning of Title 18, United States Code, Section 2510(7)—that is, I am an officer of the United States who is empowered by law to conduct investigations of, and to make arrests for, offenses enumerated in Title 18, United States Code, Section 2516(1). As an FBI Task Force Officer, I am authorized to seek and execute federal arrest and search warrants for Title 18 criminal offenses, including offenses related to the sexual exploitation of minors—e.g., violations pertaining to the illegal production, distribution, receipt and possession of child pornography in violation of Title 18, United States Code, Sections 2252 and 2252A.

3. I make this affidavit in support of a criminal complaint charging BRUCE WILLIAMS (“WILLIAMS”) with knowingly receiving and distributing child pornography using a means and facility of interstate and foreign commerce, and in and affecting such commerce, in violation of Title 18 United States Code, Section 2252A(a)(2)(A).

4. The statements contained in this affidavit are based upon my investigation, information provided by other law enforcement officers, and on my experience and training as a Task Force Officer with the FBI. As this affidavit is being submitted for the limited purpose of securing a criminal complaint, I have not included each and every fact known to me concerning this investigation. I have set forth only the facts that I believe are necessary to establish probable cause to believe that WILLIAMS has violated Title 18, United States Code, Sections 2252A(a)(2)(A).

Details of the Investigation

5. Between June 26, 2017, and August 4, 2017, your affiant used a computer connected to the Internet and a publicly available peer-to-peer (P2P) file-sharing program to focus investigation of the distribution of child pornography to a computer at IP address 24.194.177.140 that was utilizing the LimeZilla P2P network to distribute video files.

6. During that period of time, your affiant downloaded a total of twenty-eight (28) video files containing child pornography from IP address 24.194.177.140, including the five video files described below (the first four of which your affiant downloaded on June 26, 2017; the last of which your affiant downloaded on July 6, 2017). I have reviewed each of the twenty-eight video files and have found that they contain video that depicts minor children being subjected to sexual contact by adult males, engaged in sexual activity, and posed so as to expose their genitals to the camera in a lewd and lascivious manner.

a. *BabyJ - Doggied on bed 6 yr old 17 sec - Vpthc 5yo anal pedo baby fuck, loving, gentle sex.mpeg*: A video file depicting an adult male having anal intercourse with a prepubescent female who appears to be five to six years old.

b. *!!!New (PthcYo Hard Sex.avi*: A video file depicting an adult male having vaginal intercourse with a prepubescent female who appears to be five to six years old.

c. *(pthc) (2010!!!) 10yo Kate And Daddy Blowjob Cum In Mouth ULTIMATE HOT.avi*: A video file depicting an adult male having oral sexual contact with a prepubescent female who appears to be approximately five to seven years old.

d. *G] [toddler] Baby_Black(deeptroat) - PTHC 2013 NEW 0602 Awesome 3yo Girl Suck Dad Great Blowjob.MPG*: A video file depicting an adult male having oral sexual contact with a prepubescent female who appears to be two to three years old.

e. *PTHC BDSM - Toddler Girl 3yo - Crying Gagged Raped - Assfuck + Cumshot 01m15s.mpg*: A video file depicting an adult male having sexual intercourse with a prepubescent female who appears to be approximately three to four years old and who is gagged during the incident.

7. In response to a subpoena, Time Warner/Road Runner informed me that IP address 24.194.177.140 is registered to a customer who resides at XX XXXXX Avenue, XXXXXXXX XX, XXXXXXXXXX XX, Rensselaer, New York. Based upon this information, I obtained a search warrant from this Court for the residence at that address and the adult individuals who reside therein, including WILLIAMS. With the assistance of other Task Force officers, I executed the warrant on the morning of August 17, 2017, as detailed below:

8. WILLIAMS was present in the apartment when your affiant executed the warrant at approximately 7:30 a.m. Investigators conducted an on-scene forensic preview of a laptop computer that WILLIAMS identified as belonging to him, and found approximately forty (40) videos containing child pornography. Your affiant reviewed three of these videos, each of which is described below:

a. *! pthc 7yo my little girls – part1.mpg*: A video file depicting an adult male having vaginal intercourse with a prepubescent female who appears to be three to five years old.

b. *!!!!!!!(~pthc center~) (opva)(2013) thai 7yo first time with monster*

dick.mpg: A video file depicting an adult male having anal intercourse with a prepubescent female who appears to be approximately seven years old.

c. *!!! new !!! 2010 kalt 5yo -chunk2 fk pthc best.avi.avi*: A video file depicting an adult male having vaginal intercourse with a prepubescent female who appears to be three to four years old.

9. WILLIAMS answered questions and made statements to your affiant both pre- and post-*Miranda*. In both instances, WILLIAMS stated that he alone uses the laptop that he identified as belonging to him and on which investigators found the above-described videos. WILLIAMS admitted to (a) having downloaded LimeZilla to the laptop, (b) having had LimeZilla on the laptop for a number of years, and (c) using the P2P program to search for and download child pornography. WILLIAMS went on to articulate a basic understanding of file sharing and to admit that he had been using file-sharing software to download child pornography for years. WILLIAMS stated that he uses the search term “PTHC”—an acronym for “pre-teen hardcore”—to find pornography using LimeZilla. WILLIAMS further explained that his interest is in child pornography that depicts females between the ages of three and four years old, and that he masturbates to the child pornography that he downloads.

10. Finally, WILLIAMS made a post-*Miranda* admission to having placed his penis in the mouth of a five-year-old female child approximately ten years ago, and to having inserted a finger into the child’s vagina.

Conclusion

11. Based upon the above information, there is probable cause to establish that BRUCE WILLIAM has, through online peer-to-peer file sharing of videos depicting underage females being subjected to sexual activity, violated Title 18, United States Code, Section 2252A(a)(2)(A), which prohibits knowingly receiving and distributing child pornography using a means and facility

of interstate and foreign commerce, and in and affecting such commerce.

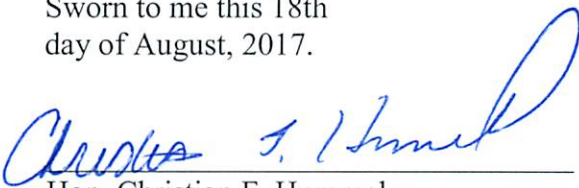
12. I therefore respectfully request that a criminal complaint be issued pursuant to these violations of federal law.

Attested to by the Applicant in Accordance
with the Requirements of Rule 4.1 of the Federal
Rules of Criminal Procedure



Christopher Smith
Task Force Officer
Federal Bureau of Investigations

Sworn to me this 18th
day of August, 2017.



Hon. Christian F. Hummel
United States Magistrate Judge